

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

GREG MCCLURE, THOMAS
MCCLURE, PHIL PIERCE, JONATHAN
AMEIGH, and CRAIG TRUDE

Plaintiffs,

v.

POLARIS INDUSTRIES, INC.,

Defendant.

Case No. _____

**PLAINTIFFS' MOTION TO SEAL PORTIONS OF COMPLAINT AND
DEMAND FOR JURY TRIAL**

Pursuant to D. Minn. LR 5.6(e), Plaintiffs Greg McClure, Thomas McClure, Phil Pierce, Jonathan Ameigh, and Craig Trude (“Plaintiffs”) respectfully request permission to file under seal portions of their Complaint, being filed contemporaneously herewith. The portions of the Complaint sought to be sealed are redacted in the attached version. Plaintiffs filed the Under Seal version of the Complaint with no highlighting, pursuant to LR 5.6 and the Sealed Civil User’s Manual, United States District Court for the District of Minnesota, in addition to the version with the portions to be sealed redacted.

The Complaint contains material and information that were filed under seal in the District Court in related action Civ. No. 16-cv-3348 and/or were designated by a party as Confidential or Highly Confidential pursuant to the January 30, 2018 Protective Order in that related action. *See Johannesson et al. v. Polaris Industries, Inc.*, Case No. 0:16-cv-03348-PJS-LIB, ECF No. 140 (D. Minn. Jan. 30, 2018). Plaintiffs believe this Complaint, in redacted form, may be made publicly available on PACER.

DATED this 23 Day of June, 2020.

Respectfully submitted,

/s/Karen Hanson Riebel

Karen Hanson Riebel (MN Bar No. 219770)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401
Telephone: 612-596-4097
Facsimile: 612-339-0981
khriebel@locklaw.com

Theodore J. Leopold (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS & TOLL
PLLC
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Telephone: (561) 515-1400
Facsimile: (561) 515-1401

Andrew N. Friedman (*pro hac vice* forthcoming)
Douglas J. McNamara (*pro hac vice*
forthcoming)
Eric A. Kafka
COHEN MILSTEIN SELLERS & TOLL
PLLC
1100 New York Ave. NW
East Tower, 5th Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699

Robert Gordon, Esq (*pro hac vice* forthcoming)
Steven Calamus, Esq. (*pro hac vice*
forthcoming)
GORDON & PARTNERS, P.A.
4114 Northlake Blvd.,
Palm Beach Gardens, FL 33410
Telephone: (561) 799-5070
Facsimile: (561) 799-4050